

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS	
FILED	
SEP 11 2013	
CLERK, U.S. DISTRICT COURT	
By _____	Deputy

UNITED STATES OF AMERICA

v.

SANDY JENKINS

§
§
§ Case No.
§
§

3 - 13 CR - 350 - K

INDICTMENT

The Grand Jury Charges:

INTRODUCTION

At all times material to this Indictment, unless otherwise indicated:

1. The Collin Street Bakery ("Bakery") is a family-owned-and-operated business with headquarters located in Corsicana, Navarro County, Texas, in the Northern District of Texas. The Bakery was established in 1896 and has several retail locations in Texas and is best known for its mail-order fruitcake business.
2. Defendant **Sandy Jenkins** was the corporate controller for the Bakery from approximately February 1998 to on or about June 21, 2013.

SCHEME AND ARTIFICE TO DEFRAUD

3. Beginning in at least January 2005 and continuing until on or about June 21, 2013, **Jenkins**, in his capacity as corporate controller for the Bakery, devised a scheme to defraud the Bakery by embezzling funds for his own self-enrichment and caused the use of the United States Postal Service in furtherance of the scheme.
4. It was part of the scheme and artifice to defraud that **Jenkins** prepared and

printed checks on the Bakery's bank account with the electronic signature of the Bakery's president.

5. It was further part of the scheme that **Jenkins** accessed the Bakery's computerized accounting system and created checks payable to **Jenkins**'s personal creditors from the Bakery's account at Community National Bank & Trust of Texas.

6. It was further part of the scheme that **Jenkins** made material false entries in the Bakery's computerized accounting system purporting to show that the checks payable to **Jenkins**'s personal creditors had been "voided."

7. It was further part of the scheme that **Jenkins** mailed the checks to his personal creditors using the United States Postal Service for **Jenkins**'s personal benefit.

8. It was further part of the scheme that **Jenkins**, in order to keep the Bakery's accounting records in balance and to disguise his fraudulent activity, accessed the Bakery's computerized accounting system and made a material, false entry in that he created a check in the accounting system to an approved vendor for the same amount as the check made payable to **Jenkins**'s personal creditor.

9. Between 2005 and 2013, **Jenkins** caused approximately 888 fraudulent checks to be written on the Bakery's account and mailed to **Jenkins**'s personal creditors, resulting in losses to the Bakery of approximately \$16,649,786.91.

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Counts One through Ten
 Mail Fraud
Violation of 18 U.S.C. § 1341

1. The allegations contained in paragraphs 1 through 2 of the "Introduction" and 3 through 9 of the "Scheme and Artifice to Defraud" of this Indictment are re-alleged and incorporated as though fully set forth in this paragraph.

2. On or about the dates indicated below, for each count below, within the Northern District of Texas, Dallas Division, the defendant, **Sandy Jenkins**, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, knowingly caused to be delivered by the United States Postal Service and private interstate carriers, according to the directions thereon, an envelope containing checks made payable to **Sandy Jenkins**'s personal creditors, mailed from the Bakery in Corsicana, Texas, to the entities identified below for the amounts described below, each such mailing constituting a separate count of this Indictment:

Count	Date	Payee	Amount
1	1/13/2011	Bank of America	\$20,000.00
2	3/1/2011	Citi Cards	\$19,737.98
3	2/1/2012	Citi Cards	\$16,636.44
4	5/2/2012	BAC H/L Servicing, LP	\$5,000.00
5	9/4/2012	Citi Cards	\$20,921.61
6	10/30/2012	American Express	\$31,649.35
7	12/3/2012	Capital One	\$19,001.50
8	12/17/2012	Bank of America	\$18,540.00
9	1/14/2013	American Express	\$33,216.74
10	2/7/2013	Capital One Bank	\$18,998.50

All in violation of 18 U.S.C. § 1341.

Forfeiture Notice

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1))

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction for any of the offenses alleged in Counts One through Ten of this Indictment, defendant **Sandy Jenkins** shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the respective offense.

This property includes, but is not limited to, the following:

1. The total proceeds derived from the offense (commonly referred to as a “money judgment”), totaling at least \$16,649,786.91
2. Real property at 1235 West Third Avenue, Corsicana, Texas, 75110; and 35 Cibola Circle, Santa Fe, New Mexico, 87505
3. Vehicles, including but not limited to the following:
 - 2010 Mercedes Benz (VIN: WDDEJ8GB9AA024372)
 - 2005 Lexus (VIN: JTHFN48Y550066823)
 - 2013 GMC Denali (VIN: 1GKS2MEF4DR228922)
 - 2013 BMW X53 (VIN: 5UXZV4C57DOE00605)
4. Approximately 60 watches from vendors including Frank Muller, Rolex, Arnex, Concord, Ebel, Elgin, Michele MW2, David Yurman, Breitling, Philip Stein, Glycine Airman, Polanti, Ulysse Nardin, Aquanautic, Cartier, Patek Philippe, Corum, Jacob & Co., Chopard, Ritmo Mundo, Corum, Locman “Latin Lover,” Maurice Lacroix “Masterpiece,” Breguet, Henry Dunay, and Gents platinum “Limited Edition for deBoulle” Souverain

5. Approximately 50 necklaces, from vendors including David Yurman Pearl and Van Cleef & Arpels "Alhambra"
6. Approximately 35 bracelets
7. Approximately 57 rings
8. Approximately 4 jewelry sets
9. Approximately 26 earrings
10. Other assorted jewelry, including pendants, cuff links, money clips, and pens
11. Coins, including collectable coins, silver dollars, and gold coins
12. One gold bar
13. Currency in the amount of \$6,598.99 (U.S. Dollars)
14. One Steinway Model B-Festival ES Piano (SN: 578848) with Opus 7 Piano Disc
15. Approximately 596 bottles of wine
16. Other luxury items, including but not limited to the following:
 - 14 furs, including nine coats, two hats, one scarf, and two blankets
 - 11 paintings
 - Approximately 93 designer handbags, wallets, luggage, and briefcases, from vendors including Louis Vuitton, Judith Leiber, Bottega Veneta, Hermès, Chanel, Marc Jacobs, Carolina Herrera, Gucci, Weitzman, and Christian Dior
 - Approximately 26 boxes of crystal or silver
 - One Naim Uniti 192 music player (SN: 320290) with Wilson Duette

speakers

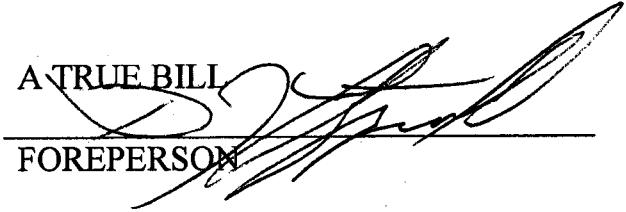
- One Compaq Presario Laptop (SN: CND6040WMW)
- One iPAD
- Six firearms, including an Iver Johnson pistol (SN: J56920), a Smith & Wesson Model 642 Airweight revolver (SN: DCL4025), a Smith & Wesson revolver (SN: BMB1623), a Smith & Wesson revolver (SN: DCX6999-642-2), a Magnum Research Micro Desert Eagle pistol (SN: ME10872), and a Glock GMBH Model 26 semi-automatic pistol (SN: FMC390).

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), if any of the property listed above, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States of America to

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seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

A TRUE BILL


FOREPERSON

SARAH R. SALDAÑA
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

VS.

SANDY JENKINS

INDICTMENT

18 USC § 1341
Mail Fraud

10 Counts

18 USC § 981(a)(1)(C); 28 USC § 2461(c); 18 USC § 982(a)(1)
Forfeiture Notice

A true bill rendered:

FORT WORTH

FOREPERSON

Filed in open court this 11th day of September A.D. 2013.

In Federal Custody

J. Meister
U.S. MAGISTRATE COURT JUDGE
(Magistrate Court Number: _____)